

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

TRACY DEBOSE LAMPKIN,)
)
Plaintiff)
) CIVIL ACTION NO.
v.) 1:06-CV-538-WKW
)
UNITED PARCEL SERVICE)
)
Defendant.)
)

MOTION TO EXTEND REPLY TO SUMMARY JUDGEMENT

COMES NOW Plaintiff, Tracy Lampkin (hereinafter "Plaintiff") without objection from the Defendant, United Parcel Service, (hereinafter "Defendant"), by and through counsel, and moves to extend the time for the Plaintiff to Reply to Defendant's Motion for Summary Judgment in the above-captioned case to January 30, 2008. In support of the motion, the Plaintiff states as follows:

1. Defendant filed its Motion for Summary Judgment on December 21, 2007;
2. Plaintiff has twenty days to reply which would be on or about January 10, 2008;
3. Defendant's Motion is quite comprehensive, and Plaintiff received

additional documents to be evaluated in preparation for the reply for said motion;

WHEREFORE Plaintiff, without objection from United Parcel Service, moves that the Court extend the time in for the Plaintiff to Reply to Defendant's Motion for Summary Judgment in the above-captioned case to January 30, 2008. A Proposed Order is attached as Exhibit "A" to this Motion.

Respectfully submitted this 4th day of January 2008

/s/Crystal M. James
Crystal M. James
Bar No. 515292
Counsel for Plaintiff
Crystal James & Associates, LLC
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EXHIBIT A

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ORDER EXTENDING TIME

Without objection from the Defendant, It is hereby Ordered that the time within which the Plaintiff shall have to file her Reply to Defendant's Motion for Summary Judgment is hereby extended to and including January 30, 2008.

SO ORDERED, this _____ day of _____, 2008.

JUDGE, UNITED STATES DISTRICT COURT

PREPARED this 4th day of January, 2008 by:

/s/Crystal M. James
Crystal M. James
Bar No. 515292
Counsel for Plaintiff
Crystal James & Associates, LLC
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